## IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

LISA LAMBERT, :

: CIVIL ACTION NO:

Plaintiff, : 96 CV. 247 Erie

v. : Judge Sean J. McLaughlin : Magistrate Judge BAXTER

SUPERINTENDENT WILLIAM WOLFE, :

et al., : (Filed via ECF)

Defendants.

## <u>Plaintiff's Brief In Opposition To</u> <u>Defendant's Motion For Partial Summary Judgment</u>

## **APPENDIX Table of Contents**

1	Complaint	A 1
2	Deposition of William Wolfe	A 19
3	Deposition of Victoria Kormanic	A 47
4	Deposition of Keith Bartlett	A 66
5	Deposition of Vaughn Davis	A 105
6	Deposition of Michael Wolanin	A 126
7	Deposition of Roger Beck	A 175
8	Deposition of Ron Lazenby	A 187
9	Deposition of Lisa Lambert	A 203
10	Documents related to investigation of CO Eicher	A 252
11	OSI Investigation of Eicher	A 270
12	Court of Common Pleas Verdict for Eicher	A 311
13	Documents related to investigation of Walton	A 312

14	Documents related to investigation of Martin Miller	A 352
15	Documents related to investigation of James Merry	A 497
16	Documents related to investigation of Michael Stone	A 510
17	Documents related to investigation of Richard Hammers	A 521
18	Documents related to investigation of Carl Zimmerman	A 538
19	Defendants' Chart Re: Inappropriate Social or Sexual Contact with a SCI-Cambridge Springs Inmate	A 572
20	Defendants' Chart re: Inappropriate Social or Sexual Contact with a SCI-Cambridge Springs Inmate	A 574
21	Extraordinary Occurrence Report re: Lambert	A 577
22	Documents related to investigation of Linda Bish	A 580
23	Documents related to investigation of Keith Bartlett	A 583
24	Code of Ethics under Commissioner Lehman, Nov. 1990	A 642
25	Letter from Vaughn Davis recommending intensifying training at Cambridge Springs	A 651
26	Documents related to Inmate Abuse Allegation Monitoring Policy	A 652
27	Documents related to investigation of Carl Zimmerman	A 673
28	Pennsylvania House of Representatives Judiciary Committee, Subcommittee on Crime and Corrections Hearings on Women's Prison Issues	A 677
29	Documents related to investigation of Kenneth Mort	A 716
30	Sexual Harassment Policy, Sept. 20, 1994	A 717
31	Documents related to Bartlett's investigations	A 720
32	Memoranda from Wolfe to Control	A 725
33	Documents related to investigation of Carl Zimmerman	A 727
34	Lisa Lambert Declaration	A 772